



- Specialty Agricultural Chemicals
- Micronutrients for Agriculture and Feed
- Product Development
- Custom Packaging and Formulating

August 15, 2005

LPG: 05-045

Mr. Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
Room 4008 - So., Ag Stop 0268
1400 Independence Ave., SW,
Washington, DC 20250

Email: National.List@usda.gov

Fax: (202) 205-7808

Re: National Organic Program, Sunset Review, Docket #TM-04-07

Dear Mr. Neal:

Monterey AgResources functions as a wholesale distributor of nutrients and pesticides to the agricultural, horticultural, lawn and garden and feed industries. As such, we offer a line of products to the organic trade, some of which we manufacture ourselves. Concentrating mainly in the western United States, we have sold these products for many years. Our customers and their growers rely upon us to provide these indispensable tools for organic crop production.

Monterey AgResources hereby supports continuance of the following exemptions:

- §205.601(e)(4) Elemental sulfur
- §205.601(e)(5) Lime sulfur (including calcium polysulfide)
- §205.601(g)(2) Vitamin D₃
- §205.601(i)(1) Coppers, fixed
- §205.601(i)(2) Copper sulfate
- §205.601(i)(3) Hydrated lime
- §205.601(i)(5) Lime sulfur
- §205.601(i)(8) Potassium carbonate
- §205.601(i)(9) Elemental sulfur
- §205.601(j)(4) Lignin sulfonate
- §205.601(j)(5) Magnesium sulfate
- §205.601(j)(6)(i) Soluble boron products
- §205.601(j)(6)(ii) Sulfates, carbonates, oxides or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt.
- §205.601(m)(1) EPA List 4 – Inerts of Minimal Concern

We believe that these substances (1) are not harmful to human health or the environment, (2) are necessary because of the unavailability of wholly non-synthetic alternatives, and (3) are consistent and compatible with organic practices. If you have any further questions, please contact me at 559-708-4287 or by e-mail to lgeorges@montereyagresources.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lynn P. Georges'.

Lynn P. Georges
Regulatory Affairs Manager

/lpg
cc: LPG-OMRI

LPG-Chron, w/o enc.